

**REMARKS**

Claims 1-20 are now pending in the above-captioned application.

**SPECIFICATION**

The Examiner notes that the Specification starts with page 3. Pages 1 and 2 comprise Patent Application Data sheet in optical scanning format. No material is missing from the application.

**REJECTION UNDER 35 U.S.C. §112, Second Paragraph**

Claims 9 and 19 were rejected under 35 U.S.C. §112, second paragraph due to some minor informalities which have been corrected by the above amendment.

**REJECTION UNDER 35 U.S.C. §102**

Claims 1-7 and 11-17 were rejected under 35 U.S.C. §102(e) as being anticipated by Wulforst et al. Applicant respectfully traverses this rejection.

In order to be complete, an anticipation-type rejection must contain two elements:

1. The reference must qualify as "Prior Art" under one of the sections of 35 U.S.C. §102; and
2. The reference must explicitly teach *ALL* of the features of the claimed invention.

Wulforst has an effective filing date more than one year prior to applicant's filing date.

Wulforst discloses a redialer for use with an alarm system. The Wulforst redialer reads the input phone number, detects whether it is an alarm company phone number, and then redirects the call to a new alarm company phone number. In an ancillary embodiment, Wulforst discloses calling a gas company if gas levels are low and outputting an account number in DTMF format.

Wulforst, however, does not disclose, teach, or suggest translating the alarm codes from an alarm system for communications with a central station.

As noted in the present specification, one problem with "conquest" sales of alarm services (i.e., switching a customer from another alarm company to your alarm company) is that in the Prior Art, it would be necessary to have central station equipment for each different type of alarm system. Having so many computers running incompatible monitoring software is cumbersome, expensive, and difficult to administer. In addition, it may be a safety risk, as the monitoring staff may not be proficient in operating all different types of monitoring computers.

The present invention solves this problem by translating the alarm signals into a standard format, so that the alarm monitoring company can monitor a number of different brands and types of alarm systems using a single (or single type) of alarm monitoring station. Thus, an alarm company can monitor signals from alarm systems installed by ADT, Brinks, or other alarm companies, without having to have separate monitoring stations for each different type of service.

While applicant's apparatus may incorporate a redialer, it comprise more than just a redialer. The Wulforst redialer does just that – it sends out a DTMF string in response to an input DTMF string. It has no capability of translating subsequent alarm codes and messages (or account numbers) into a different format. Claims 1 and 11 have been amended to more clearly point out that the present invention encompasses a redialer and translator, not merely a redialer.

Claims 5 and 15 explicitly states that alarm codes are translated by the system. This limitation has been incorporated into the independent claims to further distinguish the present invention from Wulforst. The Examiner claims that Col. 5, line 53 of Wulforst discloses translating alarm codes. However, just the opposite is the case. Col.5 line 53 of Wulforst is a table showing DTMF data the Wulforst device acts upon. Note that the table explicitly recites that in response to an old alarm company phone number being dialed, the device dials a new phone number. There is no mention of alarm codes or other alarm data being translated.

It appears the Examiner is taking the position that the term "alarm codes" is sufficiently broad to read on the phone number of the alarm company. Applicant respectfully disagrees. The term has an

ordinary meaning in the art, and moreover, is defined in the present Specification. The Examiner cannot take the term and assign it a meaning contrary to the ordinary usage of the word in order to make a 102 rejection. A phone number is a phone number, and an alarm code is an alarm code. The two do not coincide. The Examiner's reliance on this word-game is at least a tacit admission that Wulforst does not teach applicant's invention. It appears rather, that the Examiner is arguing that the term "alarm code" is sufficiently broad to encompass phone number.

While applicant disagrees with this assertion, dependent claims 5 and 15 have been amended to recite explicit examples of alarm codes, which clearly are not taught or suggested by Wulforst.

The Examiner correctly notes that Wulforst, in one embodiment, discloses a device, which may call the gas company when gas supplies are low (presumably LP gas). The dialer sends out the correct DTMF signal to call the gas company and may send other DTMF data to identify the customer, such as account number. However, this disclosure by Wulforst does not amount to a translator, as in the present invention. The Wulforst device, in its gas embodiment, merely sends out a string of DTMF data in response to a gas pressure reading. The embodiment is not even directed towards alarms. No translation is taking place.

In contrast, in the present invention, alarm data is translated using a look-up table in memory, such that an input data from the home alarm system is translated into a signal usable by the alarm monitoring station. Account data is not merely sent in response to a triggering event such as gas pressure, but may be sent in response to old account data from the alarm system. Claims 6 and 16 have been amended to make this distinction clear.

It is clear that Wulforst teaches only a redialer, and not a signal translator. As claims 1 and 11 have been amended to more clearly point out this distinction, applicant submits that claims 1-20 are distinguishable over Wulforst et al.

### **REJECTION UNDER 35 U.S.C. §103**

Claims 8, 9, 18 and 19 were rejected under 35 U.S.C. §103 as being unpatentable over Wulforst in view of Robinson. Applicant respectfully traverses this rejection.

In order to be complete, an obviousness-type rejection must contain two elements:

1. The references, as combined, must show all the features of the claimed invention (all elements rule); and
2. A *proper* motivation to combine the references must be provided.

In this instance, neither element is present.

Wulforst has been previously discussed and clearly does not show a translator. The Examiner admits in the rejection that Wulforst also does not teach an additional feature of the present invention – the use of translator libraries.

The translator libraries are important in making the device user-friendly and easy to install. As each different brand or make of alarm system may have its own different codes and signals, it is necessary that a digital translator correctly interpret these signals and output a standard code signal readable by the central station alarm company. As noted above, in making a conquest sale of alarm services, it is necessary that the customer's alarm system be quickly and inexpensively converted for use with the new alarm company's monitoring system.

Without the digital library invention, it may be necessary to either program the digital translator for each user's alarm, which requires a skilled technician, or maintain an inventory of dedicated translators, one for each popular brand of alarm system. The former approach is unworkable, as the cost of installation make the conquest sale less profitable. The latter approach requires an inventory of different translator types and can cause delays or a lost sale if the correct translator type is out of stock.

The digital library solves this problem neatly and efficiently. Based upon the alarm number dialed out, the device selects the correct translation data set and loads it into the main memory. Thus, for example, if the apparatus detects an ADT number being dialed, it will load a set of data which correctly translates ADT alarm codes. If it detects a BRINKS number being dialed, it will load a set of data which correctly translates BRINKS alarm codes. No user intervention is required, and the device can be re-used for other alarm systems without modification.

The Examiner admits that Wulforst does not teach or suggest this innovation, and applies the Robinson Patent to supply this missing element. Robinson, ironically, discloses one of the alternate embodiments of Wulforst. Wulforst discloses an embodiment whereby long-distance calls are intercepted and an access code (10-10-XXX) is inserted so that a particular long distance carrier is selected.

The cited portion of Robinson (Col. 7, lines 37-46) recites only that his device may be coupled to a personal computer so that telephone rates may be downloaded and updated into the device. No mention is made of a library of alarm codes or a translation mechanism for translating alarm codes. The reason is simple: Robinson, like Wulforst, is directed toward a redialer. As Robinson is concerned with long distance services, and not alarm services, he does not teach or suggest translation of alarm codes.

The long distance rates downloaded from a laptop are not analogous to alarm codes, as no translation of data is taking place. Moreover, even assuming one could cobble the Wulforst and Robinson devices together to make an alarm translator, the idea of downloading data from a laptop to a device is cumbersome and expensive, and defeats the purpose of the present invention – namely to provide a plug-and-play transparent alarm translation solution for conquest alarm monitoring sales.

Claims 10 and 20 were rejected under 35 U.S.C. §103 as being unpatentable over Wulforst in view of Schon. Applicant respectfully traverses this rejection.

Schon discloses a gas pressure monitoring system, which the Examiner combines with Wulforst to allegedly show all of the features of claim 10. Applicant notes that since claims 1 and 11 have been amended to distinguish the present invention over Wulforst, dependent claims 10 and 20 are now distinguishable over the combination of Wulforst and Schon. Schon, being directed toward a gas pressure monitoring system, does not correct the defects in Wulforst to show an alarm code translation system. Thus, the additional limitations of claims 10 and 20 need not been addressed in detail.

**CONCLUSION**

Wulforst teaches only a simple redialer, which is not capable of translating alarm codes from one format to another. The claims have been amended to more clearly point out that the present invention, in addition to redialing, also translates subsequent alarm codes from a look-up table so that the alarm output is in a standardized format. In addition, the use of alarm code translation libraries to automatically detect alarm system type and download the appropriate translation table is neither taught nor suggested by Wulforst or Robinson. Schoen does not correct these fundamental deficiencies of Wulforst or Robinson. Thus, applicant submits that all of claims 1-20 are now in condition for allowance.

An early Notice of Allowance is respectfully requested.

Respectfully submitted,



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